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9
10 **UNITED STATES BANKRUPTCY COURT**
11 **CENTRAL DISTRICT OF CALIFORNIA - SANTA ANA DIVISION**

12 In re:

13 THE LITIGATION PRACTICE GROUP P.C.,
14 Debtor.
15

Case No.: 8:23-bk-10571-SC

Chapter 11

**DECLARATION OF EEEYAH TAN IN
SUPPORT OF SALE MOTION AND
RELATED BRIEFS**

Date: July 21, 2023

Time: 10:00 a.m.

Judge: Hon. Scott C. Clarkson

Place: Courtroom 5C
411 W. Fourth Street
Santa Ana, CA 92701

DECLARATION OF EEEYAH TAN

I, Eeyah Tan, declare as follows:

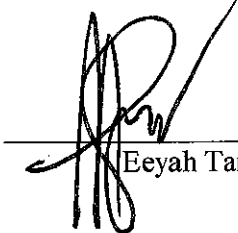
1. I am the Director of Operations of Phoenix Law, PC.
2. Phoenix Law or The Litigation Practice Group P.C. ("LPG") is a debt resolution law firm, not a debt settlement company or a credit repair company.
3. Phoenix Law/LPG has hundreds of success stories wherein it achieves favorable results including case dismissals for clients.
4. Phoenix Law/LPG plays a vital role in assisting consumers facing financial challenges through the 107 employees it currently employs.
5. According to our data, 36% of active clients are in litigation or have completed some form of litigation.
6. We at Phoenix Law/LPG assist consumers in resolving their debts through the following measures:
 - a. We notify creditors and collectors that the client is represented by our counsel, and all future communications must be directed to Phoenix Law. In case of any harassment or violations of the Fair Debt Collection Practices Act by debt collectors, we take appropriate legal action on clients' behalf.
 - b. We dispute and challenge any documentation provided by the creditors to ensure compliance with all relevant federal and state laws. To address inaccuracies, we send letters to the three major credit bureaus, disputing the accuracy of the enrolled accounts.
 - c. We provide comprehensive legal representation in all disputes related to debts, including but not limited to:
 - i. initiating legal actions against creditors when necessary;
 - ii. defending any legal actions brought by creditors against the consumers;
 - iii. asserting consumer rights against creditor harassment; and
 - iv. providing guidance on the appropriateness of filing for bankruptcy.

1 7. Phoenix Law/LPG acts as an intermediary between clients and creditors. We do not
2 negotiate pre-litigation. We strive to reduce the overall debt burden, negotiate lower interest rates,
3 and potentially secure more manageable repayment terms.

4 8. The purpose of the call center is to handle incoming calls from clients and provide
5 assistance by answering their queries related to their debts. Additionally, the call center is responsible
6 for providing monthly updates to enrolled clients regarding the status of their debts. In May 2023,
7 Phoenix Law completed 71% of calls while experiencing an abandonment rate of 24%. In June 2023,
8 our completion rate stood at 62% with an abandonment rate of 30% due to 19,000 Oakstone files
9 being transferred abruptly. Despite being significantly understaffed, the customer service team
10 completed 16,704 outbound calls in May 2023 and 10,900 in June 2023.

11 I declare under penalty of perjury under the laws of the United States of America that the
12 foregoing is true and correct.

13
14 DATED: July 17, 2023



Eeyah Tan

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is: 655 W. Broadway, Suite 800, San Diego, California 92101

A true and correct copy of the foregoing document entitled (*specify*):

DECLARATION OF EEEYAH TAN IN SUPPORT OF SALE MOTION AND RELATED BRIEFS

will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On July 17, 2023, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

☒ Service information continued on attached page

2. SERVED BY UNITED STATES MAIL:

On July 17, 2023, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on July 17, 2023, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

JUDGE'S COPY

The Honorable Scott C. Clarkson
United States Bankruptcy Court
Central District of California
Ronald Reagan Federal Building and Courthouse
411 West Fourth Street, Suite 5130 / Courtroom 5C
Santa Ana, CA 92701-4593

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

July 17, 2023
Date

Caron Burke
Printed Name

/s/ Caron Burke
Signature

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